

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: )  
 )  
Patrick L. Strong, ) Case No. 14-22006  
 ) Chapter 13  
Debtor ) Docket No.  
 )  
Patrick L. Strong, )  
 )  
Movant )  
 )  
vs. )  
 )  
Nationstar Mortgage, )  
And Ronda J. Winnecour, Trustee, )  
 )  
Respondents )

**NOTICE OF PROPOSED MODIFICATION TO**  
**CONFIRMED PLAN DATED MAY 14, 2014**

1. Pursuant to 11 U.S.C. Section 1329, the debtor has filed an Amended Chapter 13 Plan dated January 28, 2016. Pursuant to the Amended Chapter 13 Plan, the debtor seeks to modify the confirmed plan in the following particulars:
  2. The debtor's mortgage is due paid in full October 2016. The Debtor has been made aware of his options in Chapter 13. The Debtor has filed a motion to withdraw funds from his 401K to complete the case now.
  3. The proposed modification to the confirmed plan will impact the treatment of the claims of the following creditors and in the following particulars:
    - a. Nationstar Mortgage will be paid in full when the withdrawl from the Debtor's 401K is approved. The unsecured creditors will receive 100% of their claims.
4. The debtor submits that the reason for the modification is as follows:

a. See # 1 above,

5. The debtor submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The debtor further submits that the proposed modification complies with 11 U.S.C. Section 1322(a), 1322(b), 1325(a), and 1329, and except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the debtor respectfully requests that this Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

Respectfully submitted,

July 14, 2016  
DATE

/s/ Kenneth Steidl  
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